

CAUSE No. 07cv1040

DORIS POWLEDGE, INDIVIDUALLY	§	IN THE DISTRICT COURT OF
AND AS REPRESENTATIVE OF THE	§	
ESTATE OF ADAM POWLEDGE,	§	
DECEASED, THE ESTATE OF RACHEL	§	
POWLEDGE, DECEASED, THE ESTATE	§	
OF ISAAC POWLEDGE, DECEASED,	§	
THE ESTATE OF CHRISTIAN	§	
POWLEDGE, DECEASED, AND THE	§	
ESTATE OF JACOB POWLEDGE,	§	
DECEASED,	§	
	§	
Plaintiffs,	§	
	§	10 TH JUDICIAL DISTRICT
VS.	§	
	§	
RONALD ALTON POWLEDGE,	§	
	§	
Intervenor,	§	
	§	
GENERAL MOTORS CORPORATION,	§	
	§	
Defendant.	§	GALVESTON COUNTY, TEXAS

PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION TO
DEFENDANT GENERAL MOTORS CORPORATION

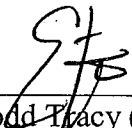
TO: Defendant, General Motors Corporation, by and through its attorneys of record, Kyle H. Dreyer and Jeffrey J. Cox of Hartline, Dacus, Barger, Dreyer & Kern, LLP, 6688 North Central Expressway, Suite 1000, Dallas, Texas 75206.

In accordance with and pursuant to the Texas Rules of Civil Procedure, Plaintiffs request that Defendant produce for discovery the documents and items specified below on or before thirty (30) days after the date of service hereof. Said items or copies of same are to be produced at the offices of The TRACY firm, 5473 Blair Road, Suite 200, Dallas, Texas 75231, or at some other reasonable and mutually agreeable location in accord with the Texas Rules of Civil Procedure. These Requests for Production shall be deemed continuing, and supplemental responses are required if Defendant or any representative of Defendant, including its attorneys, agents, or investigators, either

directly or indirectly, obtain further information of the nature sought herein between the
time of its responses and the time of trial.

Respectfully submitted,

The TRACY firm

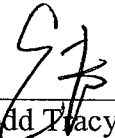


E. Todd Tracy (Lead Counsel)
State Bar No. 20178650
Andrew G. Counts
State Bar No. 24036408
5473 Blair Road, Suite 200
Dallas, Texas 75231
(214) 324-9000 Phone
(972) 387-2205 Fax

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been
forwarded to all counsel of record on this 11th day of April, 2008.



E. Todd Tracy
Andrew G. Counts

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce all complaints, not in suit matters or lawsuits wherein any Chevrolet, Pontiac, Oldsmobile or Saturn vehicle that uses the 4 cylinder engine like that used in the vehicle model in question was alleged to have experienced unwanted acceleration.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Produce any internal communication wherein any employee of defendant reported that any Chevrolet, Pontiac, Oldsmobile or Saturn vehicle that uses the 4 cylinder engine like that used in the vehicle model in question was alleged to have experienced unwanted acceleration.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce any FMEA, DFMA, failure mode analysis, fault tree analysis or root cause analysis or by whatever name called wherein defendant evaluated why the 4 cylinder engine like that used in the subject vehicle might experience unwanted acceleration.

RESPONSE: